

EXHIBIT I

Atticus Administration, LLC
Chris Longley - CEO

Goidel v Aetna

Prepared for

Eric Abrams | Attorney
eabrams@ecbawm.com
P: 212.763.5000

Emery Celli Brinckerhoff Abady Ward & Maazel, LLP
600 Fifth Avenue at Rockefeller Plaza, 10th Floor
New York, NY 10020



ATTICUS
SMART | ACCOUNTABLE | BETTER

Class Action Administration


Estimate E2024-01-E07
Goidel v Aetna

Prepared on April 25, 2024
By Chris Longley – CEO | Atticus Administration LLC

Estimate E2024-01-E07 | Goidel v. Aetna

April 25, 2024

Estimate Summary

Atticus Services & Cost Description		Key Assumptions	
NOTICE MAILING-Mailed First Class	\$101,324	<ul style="list-style-type: none">Class Size: 5,621 potential class members.Notices in English only (22 to 28 pages for each notice packet, including claim form and BRE). There will be three versions of notice – customized to the respective sub-group.Noticing includes enhanced search lookup services for 75 individuals.Noticing includes 2-rounds of reminder postcardsNotice plan includes a press release and a digital Ad campaign (see separate media plan for details).Data review, cleansing and preparing file for mailing; including NCOA, and new address searches (skip-tracing).Claims anticipated at 30% (see pricing variables below).Communications includes PO box rental, 800# with IVR, live operator phone coverage and correspondence.Communications includes a case website with interactive (claims filing) capabilities.Award checks sent to all class members that file a valid claim. Options <ul style="list-style-type: none">CAFA priced as a limited scope CAFA, if full scope CAFA is necessary, adds \$1,500.Claims levels for Category B subclass currently priced at 30%, if <20% reduces fees by \$200, if =<15%, reduces fees another \$200.Pricing to retain a Special Master will be mutually agreed upon pending necessity (if residual funds exist from the common fund).	
Initial Notice (22 to 28 pages) and BRE (3 versions)	Included		
Undeliverable/Return Mail Processing	Included		
Enhanced search services (75 individuals)	Included		
Reminder postcards notices (2 rounds)	Included		
Digital Ad media plan and press release	Included		
English only	Included		
PROJECT MANAGEMENT/ADMIN FEES/Technical	\$16,050		
CAFA (limited scope)	\$ 350		
CLAIMS [95% of 75] + [30% of 139] = 113	\$1,695		
COMMUNICATIONS	\$5,908		
PO Box rental	Included		
800# with IVR and live operators	Included		
Case website (interactive,3 versions of claims filing)	Included		
correspondence, opt-outs, objections	Included		
FUND, TAX REPORTING	\$1,934		
setup QSF, file annual tax returns, file & 1099's.	included		
1099's mailed with check (no postage)			
DISTRIBUTION	\$3,338		
check printing, payment calculation & verification, bank fees	included		
includes ONE round of distributions			
TOTAL:	\$130,599		
PRINT NAME		ROLE	
Client Signature		Date	
By signing above, I understand and agree to the pricing terms and services to be provided by Atticus Administration for the stated project.		Payment Terms: 85% payable at Notice FINAL 15% payable at Distribution	
PLEASE NOTE: This estimate and pricing is for the services stated herein and is valid for 30 days from the date of the estimate. If the Settlement Agreement or other service scope document(s) require additional services not included or priced in this estimate, we will separately price those scope changes and submit an updated quote prior to proceeding with the work.			

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Detailed Budget

Atticus Services & Cost Description

DESCRIPTION	UNITS	SUBTOTAL
NOTICE MAILING (Data Cleansing & Analysis) Mailed First Class	5,621 Class Mbrs	\$101,324
Class Data List - Cleaning & Processing	12.00 Hrs	\$1,482
Class Notice Create, Review, Proof, Finalize		\$16,838
Digital Ad Campaign (Social Media Ads)	Ads	\$62,334
Print Published Notice	NONE Ads	\$0
Press Release		\$1,000
PRINTING Class Notice 22-28 pgs: 12-14 shts w/QR code (3-versions)	5,621 notices	\$7,823
Postage Stamp (within 1 ounce max weight)	5,621 ct to mail	\$4,087
Postcard reminder notices (2 rounds)	6,000 postcards	\$3,315
Enhanced address lookup service	75 est ct	\$970
Undeliverable/ NCAO /Return Mail Processing & Remail (15%)	450 8% of class	\$1,279
Notice Request Re-Mailing	281 5% of class	\$2,196
PROJECT MANAGEMENT	75 hrs	\$15,000
TECHNICAL SET UP (includes project kick-off)	6 hrs	\$1,050
CAFA (limited scope)		\$350
CLAIMS	113	\$1,695
COMMUNICATIONS		\$5,908
Telephone - Set-Up + Monthly Fee	12 Months	\$263
Website (INTERACTIVE claims filing capabilities)	12 Months	\$2,500
Telephone - Messages/IVR (live operators)	12 Months	\$2,133
PO Box - Setup + Monthly Fee	12 Months	\$100
Correspondence - Mail	various	\$913
FUND, TREASURY & TAX Reporting		\$1,934
Set-Up QSF	2.00 Hrs	\$260
Prepare/File Annual Fund Return and 1099/1096 filings	8.00 Hrs	\$1,040
Mail 1099's no postage - mailed with check	- postage	\$0
W9 Solicitations (outreach, correspondence)	4.00 Hrs	\$520
Print 1099's	113 1099's	\$114
DISTRIBUTION, Payment Calculations & Reporting		\$3,338
Cover Letter & Check - Design/Review/Finalize	4.00 Hrs	\$494
Payment Data - Calculate & Verify Payments	6.00 Hrs	\$741
Prepare Payment Reports	6.00 Hrs	\$741
Check - Print Set-up/Printing/Mail Prep (2 checks per claimant)	226 checks	\$305
Check Mailing Postage	226 mailed	\$145
Check - Undeliverable/ NCAO /Return Mail Processing & Remail (5% Return)	281 5.0% est	\$325
Bank Fees (Account Set-Up + Monthly Fee)	24 months	\$586
DATA STORAGE	n/a	\$0
TOTAL		\$130,599

Operating Assumptions

- Class Size: **5,621 potential class members**
- Class Notice forms (three versions) 22 to 28 pages + a BRE). Price includes postage and handling fees. Notice in English only.
- Data review, cleansing and preparing file for mailing; including NCOA, and new address searches, and skip tracing if required.
- Communications includes, PO BOX and mail correspondence and toll-free 800# with IVR and live operators.
- Communications includes a case website with claims filing capabilities. Claims filing will require customization to each of the three separate sub-groups.
- Project management assumes 81 hours at a blended rate of \$198 per hour. Includes summary reporting on a weekly basis.
- Qualified Settlement fund assumes 9 months. Price includes tax reporting both state and federal returns. All bank fees are included in pricing.
- Includes one round of distributions.
- Disbursement includes positive pay "anti-fraud" features. Two rounds of distributions included.



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Scope Details

sub-Class Details (potential class members)

- Class Size is actually a POTENTIAL class of: **5,621**
separated into three sub-categories as follows:

Category "A" (est 75 individuals)

- Basic sub-class, denied basic fertility coverage for sexual orientation
- Notice w/ Opt-OUT option only
- Send notice and request for address verification
up to 22 pages total with BRE to return any address update(s).
also a QR code to update address only.

Category "B" (est 775 individuals)

- These are POTENTIAL class members
- "Denied Fertility Service" sub-class, confirmed.
- Need to CLAIM (verify) part of defined group of sexual orientation.
- denied basic fertility coverage for sexual orientation
- Notice w/ CLAIM Form and BRE.
- Send notice and request for address verification
up to 24 pages total with BRE to return claim form.
also a QR code to file online claim.

Category "C" (est 4,771 individuals)

- These are POTENTIAL class members
- Need to verify CLAIM (verify) part of defined group of sexual orientation.
- denied basic fertility coverage for sexual orientation
- Notice w/ CLAIM Form and BRE.
- Send notice and request for address verification
up to 28 pages total with BRE to return claim form.
Also a QR code to file online claim.

Related Claims Process and Award notes

Category "A"

- There is NO required claims process for **Tier 1 award**.
- Sub-class A receive up to a \$10,000 award payment
..unless they Opt-OUT
- May also claim out-of-pocket monies, **Tier 2 award**.
- This sub-class qualifies for "additional compensation"
from common fund for additional intangible harm
(subject to Special Master review), **Tier 3 award**.

Category "B"

- This sub-class must file a simple claims of ATTESTATION
that they are part of the defined group of sexual
orientation (the defined class) for **Tier 1 award**.
- These claims receive up to a \$10,000 award payment.
- May also claim out-of-pocket monies, **Tier 2 award**.
- This sub-class qualifies for "additional compensation"
from common fund for additional intangible harm
(subject to Special Master review), **Tier 3 award**.

Category "C"

- This group must file a claim that proves they are part of the
class and may only claim actual fertility treatment expenses
incurred but denied for reimbursement from Aetna. These
claims are this group's **Tier 1 award**.
- May also claim out-of-pocket monies, **Tier 2 award**.
- This sub-class qualifies for "additional compensation"
from common fund for additional intangible harm
(subject to Special Master review), **Tier 3 award**.



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Scope Details (continued)

Supplemental explanation of service line items.....

- (1) Notice Design is included in noticing pricing.
- (2) Monthly phone and URL charges are included in communications pricing.
- (3) Processing Details
 - o Claims:
 - Creating paper form, developing processing procedures, copying, and scanning documents, data entry, staff training, creating online form validation and verification logic, and testing time, and staff time to verify claims.
 - Management of Deficient claims, including development of cure letters, sending, receiving, and processing responses.
 - o Opt Out Processing Details
- (4) Communications **includes:**
 - o Website – content development and site build
 - o Telephone – drafting script, training CSRs, providing detailed call reporting.
- (5) Distribution Services **includes:**
 - o Monthly bank fees
 - o Account reconciliation
 - o Per Check bank transactional fees
 - o Breakdown of checks by Tiers 1, 2, and 3
- (6) Project Management/Admin/Technical Fees **includes:**
 - o Client meetings and correspondence
 - o Weekly and all reporting
 - o Handling class member escalations
 - o Day to day oversight and direction
 - o Declarations





Thank you



Chris Longley – CEO

612-315-9007 (Direct)
651-755-2552 (Cell)
clongley@atticusadmin.com

1295 Northland Drive Suite 160
St. Paul MN 55120

www.atticusadmin.com